

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION

WINIFRED BLACKLEDGE )

Plaintiff, )

vs. )

CASE No.: CV 2:06-CV-321-ID

ALABAMA DEPARTMENT OF )  
MENTAL HEALTH & MENTAL )  
RETARDATION & COMMISSIONER )  
JOHN HOUSTON, in his Official )  
Capacity as Commissioner. )

Defendants. )

**PLAINTIFF'S OBJECTION TO THE DEFENDANTS'  
VOIR DIRE QUESTIONS**

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**COMES NOW** the plaintiff, by and through the undersigned counsel, and objects to the Defendants' Voir Dire Questions as follows:

- 1.(a). The plaintiff objects to the explanation of attorney Tarver's employment history.
- 1.(b). The plaintiff objects to the explanation of attorney Tarver's employment history.
3. The plaintiff objects to the introduction which attempts to describe the purpose of defendant Department.
10. The plaintiff objects to this question in its entirety.
- 11.(e). The plaintiff objects to this question in its entirety.
17. The plaintiff objects to this question in its entirety.

19. The plaintiff objects to this question in its entirety.

Respectfully submitted,

/s/Rocco Calamusa, Jr.

Rocco Calamusa, Jr.

Joshua D. Wilson

*Attorneys for the Plaintiff*

OF COUNSEL:

WIGGINS, CHILDS, QUINN & PANTAZIS, LLC

The Kress Building

301 19<sup>th</sup> Street North

Birmingham, Alabama 35203

205/314-0500

**CERTIFICATE OF SERVICE**

I do hereby certify that on this the 18<sup>th</sup> day of February, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

TROY KING

ATTORNEY GENERAL

COURTNEY W. TARVER

Deputy Attorney General and General Counsel

State of Alabama Department of

Mental Health and Mental Retardation

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/s/Rococ Calamusa, Jr.

OF COUNSEL